Date: 1/2/07

## IN WITNESS WHEREOF, the undersigned have caused this Settlement

Agreement to be executed as of the dates set forth below:

FOR THE FREY DEFENDANTS:	FOR THE RANDOM HOUSE DEFENDANTS:
James Frey	Robert Sorrentino
Date: 1/2/07	Senior Vice President, Taxes, Random House, Inc.  Date:
lames Frey	Robert Sorrentino
Big Jim Industries, Inc. Date: 1/2/07	President, Doubleday & Company, Inc.
Maya Frey	Robert Sorrentino
Date: 1/2/07	Vice President, Taxes, Random House VG, Inc.  Date:
Derek J. Meyer McDermott Will & Emery LLP 227 West Monroe Street, Suite 4400	Mark B. Blocker Sidley Austin LLP
Chicago, Illinois 60606 Attorney for the Frey Defendants	One South Dearborn Chicago, Illinois 60603 Attorney for the Random House Defendants

Date:\_\_\_\_

Agreement to be executed as of the dates set forth below:

FOR THE FREY DEFENDANTS:	FOR THE RANDOM HOUSE DEFENDANTS.
	Walte
James Frey	Robert Sorregion Senior Vice President, Taxes, Random House, Inc.
Date:	Date: 12/15/06
James Frey	Robert Sorrentino
Big Jim Industries, Inc.	President, Doubleday & Company, Inc.
Date:	Date: 12/15/06
Maya Frey	Robert Sorrentino Vice President, Taxes, Random House VG, Inc.
Date:	Mark B Blocker
Doob I Manager	Mark B Blocker
Derek J. Meyer McDermott Will & Emery LLP	Mark B. Blocker Sidley Austin LLP
227 West Monroe Street, Suite 4400	One South Dearborn
Chicago, Illinois 60606	Chicago, Illinois 60603
Attorney for the Frey Defendants	Attorney for the Random House Defendants
Date:	Date: 12 /28/2006

FOR	THE	PI A	INT	FFC
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Plaintiff Marcho Vedral	Michele Snow
Larry D. Drury Ltd. 205 W. Randolph Street, Suite 1430 Chicago, Illinois 60606 Proposed Co-Leud Class Counsel Attorney for Plaintiff Marcia Vedral	Evan J. Smith, Esquire Brodsky & Smith, LLC Two Bala Plana, Suite 602 Bala Cynwyd, PA 19004 (610) 667-6200 Proposed Co-Load Class Counsel Atturney for Plaintiff Michele Snow
Date: 12-6-06	Date: 12-6-06
Plaintiff Jennifer Colui Date:	Plantiff Aun Marie Strack Date:
Thomas Mulisney 708 Third Avenue, Suite 2500 New York, New York 10017 Phone: (212) 223-0800 Liuison Class Counsel Attorneys for Plaintiff Jennifer Cohn	Thomas A. Zimmerman, Jr. Zimmerman and Associates, P.C. 100 West Monroe Street, Suite 1300 Chreago, Illinois, 60603 Attorney or Plaintiff Ann Marie Street
Date:	Date:

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## FOR THE PLAINTIFFS:

DI CONTRACTOR IN THE PROPERTY OF THE PROPERTY	
Plaintiff Marcia Vedral	Plaintiff Michele Snow
Date:	Date:
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Larry D. Drury	Evan J. Smith, Esquire
Larry D. Drury Ltd.	Brodsky & Smith, LLC
205 W. Randolph Street, Suite 1430	Two Bala Plaza, Suite 602
Chicago, Illinois 60606	Bala Cynwyd, PA 19004
Proposed Co-Lead Class Counsel	(610) 667-6200
Attorney for Plaintiff Marcia Vedral	Proposed Co-Lead Class Counsel
	Attorney for Plaintiff Michele Snow
Date:	Date:
Plaintiff Diane Marolda	Plaintiff Ann Marie Strack
Date: 12/7/06	Date:
Thomas Mullaney	Thomas A. Zimmerman, Jr.
708 Third Avenue, Suite 2500	Zimmerman and Associates, P.C.
New York, New York 10017	100 West Monroe Street, Suite 1300
Phone: (212) 223-0800	Chicago, Illinois 60603
Liaison Class Counsel	Attorney or Plaintiff Ann Marie Strack
Attorneys for Plaintiff Diane Marolda	
Date: 12.5.2004	Date:

## FOR THE PLAINTIFFS:

Plaintiff Marcia Vedral	Plaintiff Michele Snow
Date:	Date:
Larry D. Drury	Evan J. Smith, Esquire
Larry D. Drury Ltd.	Brodsky & Smith, LLC
205 W. Randolph Street, Suite 1430	Two Bala Plaza, Suite 602
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Proposed Co-Lead Class Counsel	(610) 667-6200
Attorney for Plaintiff Marcia Vedral	Proposed Co- Lead Class Counsel
	Attorney for Plaintiff Michele Snow
Date	-
Date:	Date:
Plaintiff Jennifer Cohn	Plaintiff Ann Marie Strack
Date:	Date: 12-8-06
	Date. (2 5 00
	16.17
Thomas Mullaney	Thomas A. Zimmerman, Jr.
708 Third Avenue, Suite 2500	Zimmerman and Associates, P.C.
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Phone: (212) 223-0800	Chicago, Illinois 60603
Liaison Class Counsel	Attorney or Plaintiff Ann Marie Strack
Attorneys for Plaintiff Jennifer Cohn	The second secon
Date:	Date: 12-11-2006
zate.	Date: 10 11 1006

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Plaint I Jimpy Hoyd	Plaintiff Jill Giles
Dest 1/4/07 - 1	Date:
Alan S. Ripka Napoli Bern Ripka LLP 115 Broadway	Alan J. Statman Colleen M. Hegge (of counsel) 2900 Chemed Center
New York, New York 10006 Attorney for Plaintiff Jimmy Floyd	255 East Fifth Street Cincinnati. Ohio 45202 Attorneys for Plaintiff Jill Giles
Date: December 5, 2006	Date:
Plaintiff Pilar More	Plaintiff Shera Paglinawan
Date:	Date:
Thomas E. Pakenas Dale and Pakenas 641 W. Lake Street, Suite 400 Chicago, Illinois 60661 Attorneys for Plaintiff Pilar More	Michael David Myers Myers & Company, P.L.L.C. 1809 Seventh Avenue, Suite 700 Scattle, Washington 98101 Attorney for Plaintiff Shera Paglinawan
Date:	Date:
Plaintiff Sara Brackenrich	
Date:	
Vincent L. DiTommaso DiTommaso & Lubin, PC 17W 220 22nd Street, Suite 200 Oakbrook Terrance, Illinois 61081 Attorney for Plaintiff Sara Brackenrich	

Date:\_

Plaintiff Jimmy Floyd	Plaintiff Jill Giles
Date:	Date:
Alan S. Ripka	Alan J. Statman
Napoli Bern Ripka LLP	
115 Broadway	Colleen M. Hegge (of counsel) 2900 Chemed Center
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Attorney for Plaintiff Jimmy Floyd	5 - 1 (2-1) 4 (3 ) 1 (3 ) 1 (3 ) 3 (4 ) 3 (4 ) 3 (4 ) 3 (4 ) 3 (4 ) 3 (4 ) 3 (4 ) 4 (4 ) 4 (4 ) 4 (4 ) 4 (4 )
2,	Cincinnati, Ohio 45202
	Attorneys for Plaintiff Jill Giles
Date: 11/29/06	Date:
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Plaintiff Pilar More	Plaintiff Shera Paglinawan
Date: 11 / 29/06	Date:
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Thomas E. Pakenas	Michael David Myers
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541 W. Lake Street, Suite 400	1809 Seventh Avenue, Suite 700
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Attorneys for Plaintiff Pilar More	Attorney for Plaintiff Shera Paglinawan
Date:	Date:
Plaintiff Sara Brackenrich	
Date:	
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Vincent L. DiTommaso	
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Plaintiff Jimmy Floyd	Plaintiff Jill Giles
Date:	Date;
Alan S, Ripka	Alan J. Statman
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115 Broadway	2900 Chemed Center
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Attorney for Plaintiff Jimmy Flayd	Cincinnati, Ohio 45202
	Attorneys for Plaintiff Jill Giles
Date:	Date:
Plaintiff Pilar More	Plaintiff Shera Paglinawan
Date:	Date:
Thomas E. Pakenas Dale and Pakenas 641 W. Lake Street, Suite 400 Chicago, Illinois 60661 Attorneys for Plaintiff Pilar More	Plaintiff Wendy Shaw  Date:
Date:	Michael David Myers
szac.	Myers & Company, P.L.L.C.
	1809 Seventh Avenue, Suite 700
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	Attorney for Plaintiff Shera Paglinawan
	Date:
Jan Daule or	
Plaintiff Sara Brackenrich	
Date: 20 Nov. 06	
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Plaintiff Jimmy Floyd	Plaintiff Fill Giles
Date:	Date: 12-7-06
Alan S. Ripka Napoli Bern Ripka LLP 115 Broadway New York, New York 10006 Attorney for Plaintiff Jimmy Floyd	Alan J Statman Colleen M. Hegge (of counsel) 2900 Chemed Center 255 East Fifth Street Cincinnati, Ohio 45202 Attorneys for Plaintiff Jill Giles
Date:	Date: 12-7-04
Plaintiff Pilat More  Date:	Plaintiff Shera Paglinawan  Date:
Thomas E. Pakenas Dale and Pakenas 641 W. Lake Street, Suite 400 Chicago, Illinois 60661 Anorneys for Plaintiff Pilar More Date:	Michael David Myers Myers & Company, P.L.L.C 1809 Seventh Avenue, Suite 700 Seattle, Washington 98101 Attorney for Plaintiff Shera Paglinawan Date:
Plaintiff Sara Brackentich  Date:	
Vincent L. DiTommaso DiTommaso & Lubin, PC 17W 220 22nd Street, Suite 200 Oakbrook Terrance, Illinois 61081 Attorney for Plaintiff Sar a Brackenrich Date:	•

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Plaintiff Jill Giles
The Giles
Date:
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Alan J. Statman
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Attorneys for Plaintiff Jill Giles
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Plaintiff Shera Paginawan
Date: 3 Per 3500
Date: 5 Dec. 2000e
Plaintiff Wendy Shaw
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Michael David Myers
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Myers & Company, Pl. C.
TOUT DEVENIN A MANUAL CO.
Seattle, Washington Dates
Attorney for Plaintiff Shera Paglinawan
Date: 12 . 3 . 2006
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Plaintiff Jimmy Floyd	Plaintiff Jill Giles
Date:	Date:
Alan S. Ripka	Alan J. Statman
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115 Broadway	2900 Chemed Center
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Attorney for Plaintiff Simmy Floyd	Cincirmati, Ohio 45202
	Attorneys for Plaintiff Jill Giles
Date:	Date:
Plaintiff Pilar More	Plaintiff Shera Paglinawan
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Date:	Date:
Thomas E. Pakenas Dale and Pakenas 641 W. Lake Street, Suite 400 Chicago, Illinois 60661 Attorneys for Plaintiff Pllar More	Plaintiff Wordy Shaw  Date: 2/06
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- TTOP (	Michael David Myers
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	Seattle, Washington 98101
	Autorney for Platnuff Shera Paglinawan
	Date:
Plaintiff Sara Brackenrich	-
Date:	
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